

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**Fairfield Sentry Limited (In Official Liquidation),**  
**acting by and through the**  
**Foreign Representatives thereof,**

**Plaintiffs,**

**-against-**

**FS/HSBC Private Banking Nom and**  
**Beneficial Owners of the Accounts Held in the**  
**Name of FS/HSBC Private Banking**  
**Nom 1-1000,**

**Defendants.**

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**Adv. Pro. No.**

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**Fairfield Sentry Limited, et al. (In Official**  
**Liquidation), acting by and through the**  
**Foreign Representatives thereof,**

**Plaintiffs,**

**-against-**

**Robinson & Co. and Beneficial Owners of the**  
**Accounts Held in the Name of Robinson**  
**& Co. 1-1000,**

**Defendants.**

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**Adv. Pro. No. 10-03628 (BRL)**

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Fairfield Sentry Limited, et al. (In Official  
Liquidation), acting by and through the  
Foreign Representatives thereof,

Plaintiffs,

-against-

HSBC Private Bank (Guernsey) LTD and  
Beneficial Owners of the Accounts Held in the  
Name of HSBC Private Bank  
(Guernsey) LTD 1-1000,

Defendants.

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Adv. Pro. No.

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Fairfield Sentry Limited, et al. (In Official  
Liquidation), acting by and through the  
Foreign Representatives thereof,

Plaintiffs,

-against-

Caceis Bank Luxembourg and Beneficial  
Owners of the Accounts Held in the Name of  
Caceis Bank Luxembourg 1-1000,

Defendants.

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Adv. Pro. No. 10-03624 (BRL)

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Fairfield Sentry Limited (In Official Liquidation),  
acting by and through the  
Foreign Representatives thereof,

Plaintiffs,

-against-

Citibank NA London and Beneficial Owners of  
the Accounts Held in the Name of  
Citibank NA London 1-1000,

Defendants.

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Adv. Pro. No. 10-03622 (BRL)

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Fairfield Sentry Limited, et al. (In Official  
Liquidation), acting by and through the  
Foreign Representatives thereof,

Plaintiffs,

-against-

Citibank (Switzerland) Zurich, et al.

Defendants.

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Adv. Pro. No.

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Fairfield Sentry Limited (In Official Liquidation),  
acting by and through the  
Foreign Representatives thereof,  
  
Plaintiffs,  
  
-against-  
  
Zurich Capital Markets Company and  
Beneficial Owners of the Accounts Held in the  
Name of Zurich Capital Markets  
Company 1-1000 et al.,  
  
Defendants.

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Adv. Pro. No.

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Fairfield Sentry Limited, et al. (In Official  
Liquidation), acting by and through the  
Foreign Representatives thereof,  
  
Plaintiffs,  
  
-against-  
  
BNP Paribas Securities Services  
Luxembourg and Beneficial Owners of the  
Accounts Held in the Name of BNP Paribas  
Securities Services Luxembourg 1-1000,  
  
Defendants.

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Adv. Pro. No. 10-03627 (BRL)

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Fairfield Sentry Limited (In Official Liquidation),  
acting by and through the  
Foreign Representatives thereof,

Plaintiffs,

-against-

BNP Paribas Luxembourg SA and  
Beneficial Owners of the Accounts Held in  
the Name of BNP Paribas Luxembourg SA  
1-1000,

Defendants.

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Adv. Pro. No. 10-03626 (BRL)

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Fairfield Sentry Limited, et al. (In Official  
Liquidation), acting by and through the  
Foreign Representatives thereof,

Plaintiffs,

-against-

ABN AMRO Schweiz AG, et al.

Defendants.

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Adv. Pro. No.

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Fairfield Sentry Limited (In Official Liquidation),  
acting by and through the  
Foreign Representatives thereof,

Plaintiffs,

-against-

ABN AMRO Schweiz AG, et al.

Defendants.

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Adv. Pro. No.

**MOTION OF MOVING DEFENDANTS TO WITHDRAW  
THE REFERENCE OF THE ABOVE-CAPTIONED  
ADVERSARY PROCEEDINGS TO THE BANKRUPTCY COURT**

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TO THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK:

HSBC Private Bank (Suisse) SA, HSBC Securities Services  
(Luxembourg) SA, HSBC Bank USA NA, HSBC Private Bank (C.I.) Limited, HSBC  
Private Banking Nominee 1 (Jersey) Limited, Robinson & Co., Caceis Bank  
Luxembourg, Citibank NA London, Citibank (Switzerland) AG, Citigroup, Citivic  
Nominees Limited, BNP Paribas Securities Services Luxembourg, BNP Paribas  
Luxembourg SA, BNP Paribas (Suisse) SA, BNP Paribas (Suisse) SA Ex Fortis, and  
BNP Paribas (Suisse) SA Private, (collectively, the “Moving Defendants”), as named  
defendants in the above-captioned Adversary Proceedings, respectfully moves the United  
States District Court for the Southern District of New York for an entry order, pursuant to  
28 U.S.C. §157(d), Federal Rules of Bankruptcy Procedure 5011, and Rule 5011-1 of the  
Local Rules of Bankruptcy Court for the reasons set forth in the accompanying  
memorandum of law with supporting declaration, which are hereby incorporated by  
reference.

The Moving Defendants have made no prior request to this Court or to any  
other court for the relief requested by this Motion.

WHEREFORE, the Moving Defendants respectfully request that the Court  
enter an order granting the relief requested herein, and such other and further relief as the  
Court deems just and appropriate.

Dated: New York, New York  
September 20, 2010

CLEARY GOTTlieb STEEN & HAMILTON LLP

By S/ Evan A. Davis

Evan A. Davis, a Member of the Firm

*Attorneys for Defendants HSBC Private Bank  
(Suisse) SA, HSBC Securities Services  
(Luxembourg) SA, HSBC Bank USA NA, HSBC  
Private Bank (C.I.) Limited, HSBC Private Banking  
Nominee 1 (Jersey) Limited, Robinson & Co.,  
Caceis Bank Luxembourg, Citibank NA London,  
Citibank (Switzerland) AG, Citigroup, Citivic  
Nominees Limited, BNP Paribas Securities Services  
Luxembourg, BNP Paribas Luxembourg SA, BNP  
Paribas (Suisse) SA, BNP Paribas (Suisse) SA Ex  
Fortis, and BNP Paribas (Suisse) SA Private*